

December 21, 2005

Mr. Dan McNaughton  
Canadian Environmental Assessment Agency  
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Dear Mr. McNaughton,

**Re: Manitoba Wildlands' Comments - Wuskwatim Generation Project  
Canadian Environmental Assessment Act Comprehensive Study Report**

Enclosed you will find several documents comprising Manitoba Wildlands' comments on the *Wuskwatim Generation Project Canadian Environmental Assessment Act Comprehensive Study Report* ('CSR'), prepared by the Department of Fisheries and Oceans (DFO) – Central and Arctic Region (October 2005). Please make sure all the contents here are posted in the CEEA registry regarding this project.

Manitoba Wildlands has been participating in the review of the Wuskwatim projects since December 2001 when Manitoba Hydro filed environmental proposals under the Manitoba Environment Act. We participated in the review of the EIS Guidelines, provided comments on the EIS, and participated in the Clean Environment Commission (CEC) hearings for the Wuskwatim projects, as well as all of the processes that occurred in the lead-up to the hearings. When the CEC released its report on the Wuskwatim Hearings in fall 2004, Manitoba Wildlands provided feed back on their report, which we also provided to federal authorities, since the CSR was not yet available.

Our main concerns regarding the DFO CSR for the Wuskwatim generation stations are contained both in the General Comments document provided here and in a set of CSR page by page comments.

The deficiencies in the original EIS, lack of action on recommendations from the Manitoba Clean Environment Commission, failure to fulfill the cooperative environmental assessment agreement, failure to fulfill the EIS Guidelines for the Wuskwatim projects, and the failure of the CSR to accurately and independently assess the Wuskwatim generation station all point to the need for further review by federal responsible authorities under CEAA. It is a matter of record that communities and environmental organizations in Manitoba asked for a federal environmental panel in the first place as early as 2001, expected to see a joint federal provincial panel, and then found that the whole combined project was not going to be reviewed by Canada, despite federal responsibilities evident to concern communities and stakeholders. Then the CEC hearings were arbitrarily combined with Manitoba's usual Public Utility Commission hearings.

We respectfully suggest that the issue of scope for the Wuskwatim projects was sidestepped, and that we live in a province where the whole hydro system requires cumulative assessment in order for appropriate decisions regarding future operation of the system, and any future additions to the system. When government is the developer, the reviewer, and issues the licenses, something better than what has occurred with the Wuskwatim projects must be expected.

Although it is perhaps outside the scope of responsible federal authorities in terms of their obligations under CEAA in producing the CSR, we feel it is within the scope of Ministerial consideration to note our serious concerns regarding the financial viability of the Wuskwatim projects. The delayed start date /in-service date for the projects (the proponents' intent, as per the EIS was to begin construction in 2004) and there are additional costs associated of \$130 million identified for 2005. This raises questions as to the projects' financial viability. More importantly however, we question the wisdom of spending close to a billion dollars for 200MW of power and have to wonder, given the price tag for 200MW of additional power through demand side management (DSM) or 200MW of wind power would be about \$400 million. The economic review that the CEC carried out in parallel to its environmental proceedings about the Wuskwatim projects left unanswered questions.

In addition to providing our own comments, Manitoba Wildlands wishes to formally indicate support for the feedback on the CSR provided by the Natural Resources Defense Council, the Pimicikimak Cree Nation, the Manitoba Métis Federation, and comments submitted by Trap Line 18.

Documents included in this package:

- This covering letter
- Manitoba Wildlands' Overarching Comments on the CSR
- Manitoba Wildlands' Specific Comments on the CSR (page by page; not comprehensive)
- Listing & links for certain Manitoba Wildlands work products concerning the Wuskwatim Generation and Transmission Projects

We expect that all materials we have included here will be placed in the public registries, both federal and provincial. It would be appreciated if CEAA could take steps so that Manitoba Conservation's public registry holds all comments with respect to the CSR (already on deposit.)

Yours truly,

Gaile Whelan Enns  
Director, Manitoba Wildlands

Copy to:  
Honourable Stephane Dion  
Honourable Geoff Regan  
Honourable Jean-C. Lapierre  
Honourable Stan Struthers  
Honourable David Chomiak