

Terry Sargeant, Chair,
Clean Environment Commission
305 – 155 Carlton Street
Winnipeg, Manitoba R3C 3H8

October 10, 2013

Sent by Email

Dear Mr. Sargeant:

Re: Peguis First Nation motion with respect to Keeyask Generation Station project, and the Clean Environment Commission review of the project. Motion To:

- (a) Adjournment of the (Keeyask) proceedings until completion of an independent and comprehensive regional cumulative effects assessment (“RCEA”) of the impacts of hydro development on the Nelson River and Churchill River Watershed.....: or
- (b) a scheduled adjournment of the final evidence and arguments before the CEC regarding the Project until completion of an independent and comprehensive RCEA of the impacts of hydro development on the Nelson River and Churchill River Watersheds

Manitoba Wildlands supports this motion based on the need for procedural fairness, and the CEC’s ability to “delay the commencement of hearings, adjourn, suspend hearings, or extend time in order to receive relevant information and documents.”

The CEC, in its report and recommendations regarding the previous proceedings, in which Peguis First Nation was a participant, recommended that a RCEA of all projects and associated infrastructure in the Nelson River sub-watershed should be, “undertaken **prior** to the licensing of any additional projects the Nelson River sub-watershed after the Bipole III Project”

In its Bipole III report the CEC also ““rightly noted in the Bipole III Report that the assessment process was wholly inadequate due to a lack of an overall plan for environmental assessment, and the failure to take into account the cumulative effects of hydro-electric developments that "have had a profound impact on communities in the area of these projects, as well as on the environment upstream and downstream.””

Manitoba Wildlands notes that the Keeyask EIS was prepared in the same time period when the Bipole III EIS was prepared, being filed 6 months later. While it remains to be seen if the Keeyask EIS is also inadequate, the CEC has previously identified deficiencies in EA, and the technical information filed for review of a Manitoba Hydro project. The CEC has also previously made this recommendation for a cumulative effects assessment of Hydro projects in Manitoba’s system.

We also note that the Minister of Conservation and Water Stewardship accepted this recommendation from the CEC upon review of the Bipole III report.

The opportunity exists to have the results of a RCEA before making any further decisions regarding Manitoba Hydro's Development Plan, and in particular the Keeyask Generation Project. The context and quality of information for decision making would be dramatically enhanced with the results from the RCEA.

Manitoba Wildlands thanks Peguis First Nation for filing this notice of motion and supports the motion. We assert that the RCEA should be an independent undertaking inclusive of affected First Nations. In particular given the delay for Lake Winnipeg Regulation Hearings, the RCEA should include Lake Winnipeg.



Gale Whelan Enns
Director, Manitoba Wildlands.