



NATURAL RESOURCES DEFENSE COUNCIL

December 21, 2005

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**Re: Comments Concerning Wuskwatim Hydro-Electric Generating Station Project:  
Federal Environmental Assessment/Comprehensive Study**

Dear Mr. McNaughton,

Please accept these comments from the Natural Resources Defense Council (NRDC) concerning the federal environmental assessment/comprehensive study of the Wuskwatim Hydro-Electric Generating Station Project issued for public comment on November 18, 2005. NRDC objects to the conclusion of this Fisheries and Oceans Canada (DFO) and Transport Canada environmental assessment (DFO study) that the proposed project is not likely to cause significant adverse environmental effects. NRDC finds that the scope of the study was not broad enough to appropriately assess the proposed project. NRDC requests that the Minister of Environment refer the project for further environmental assessment by an independent review panel with a newly defined and broader scope to be determined.

Founded over 30 years ago, NRDC is a public interest, private, not-for-profit advocacy organization, based in New York, with an international group of members and activists numbering over one million individuals. NRDC's mission is to safeguard the Earth: its people, its plants and animals, and the natural systems on which all life depends. NRDC has a long history of working in cooperation with partners in Canada to protect shared natural resources and natural resources of global importance. The boreal forest ecosystem affected by the proposed Wuskwatim hydro-electric projects is globally important as a nursery for international migratory birds, as home of threatened woodland caribou, as a defense against climate change, and as one of the last remaining wilderness forests on earth. Further, Manitoba Hydro has close ties with U.S. electricity markets, already selling approximately 40% of its hydropower generated electricity to the United States. This creates a further interest among NRDC members – whether they live in the United States or in Canada – in promoting environmentally sustainable energy sources. NRDC members and activists have sent over 45,000 letters to the Manitoba and Canada governments over the last two years expressing their concerns regarding adverse

environmental and social impacts from the proposed Wuskwatim hydro-electric projects, especially as this proposed project is the first of several planned new hydro-power projects in Manitoba.

NRDC fully supports the positions taken by Manitoba Wildlands in its more detailed comments (submitted December 21, 2005) concerning the DFO environmental assessment of the Wuskwatim Generation Station. Manitoba Wildland's comments reflect the many excellent and thorough assessments provided of the environmental and social impacts of the proposed Wuskwatim hydro-electric projects through the Manitoba Clean Environment Commission's (CEC) hearing process, including the public participants' technical review, evidence, expert testimony, and cross examination of the proponents. The Canadian Environmental Assessment Act requires that this type of study consider comments from the public<sup>1</sup> and that the responsible authority report the concerns of the public in relation to the project to the Minister.<sup>2</sup> That this body of material available through the CEC hearings does not seem to have been taken into adequate consideration in the DFO study is a weakness of the DFO study that should be remedied through a further, independent assessment.

DFO claims to have undertaken a comprehensive analysis of the project prior to submitting this environmental assessment to the Minister of the Environment and to the Canadian Environmental Assessment Agency. NRDC found that DFO's scoping of the project was not adequately comprehensive. The DFO study failed to include transmission lines effects (despite claiming to have taken these into consideration) and did not give sufficient attention to the cumulative environmental effects of the proposed Wuskwatim facilities in the context of the existing hydropower system and, perhaps most importantly, the other planned hydropower projects across the region.

We are aware that the review process conducted by the CEC included unprecedented public participation, analysis, and review. Public participants' efforts also facilitated contributions from independent experts in the CEC hearings. We also note that public involvement is one of the primary purposes of federal environmental assessment in Canada. Our review of DFO's comprehensive study indicates that on the whole, careful and thoughtful consideration of any information other than that of the proponent's is not reflected in the content of the study. This means that the DFO comprehensive study essentially dismisses the public concerns evident in more than 2 years of review in respect to the Manitoba Environment Act.

The DFO study characterizes the project as the Wuskwatim Generation Station, and neglects to give adequate consideration to the three segment transmission system that is included in Manitoba Hydro's proposal. The DFO study noted that the proposed transmission lines were not found to justify federal assessment.<sup>3</sup> However, without an

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<sup>1</sup> Canadian Environmental Assessment Act, 16(1)(c).

<sup>2</sup> Canadian Environmental Assessment Act, 21(2)(a)(ii).

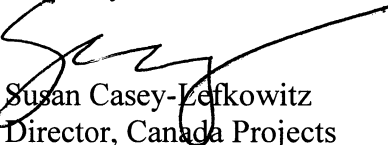
<sup>3</sup> *Wuskwatim Generation Project: Canadian Environmental Assessment Act Comprehensive Study Report*, Fisheries and Oceans Canada Central and Arctic Region, October 2005, page 21.

assessment of the transmission lines, the DFO study is considering the project in a piecemeal fashion and minimizing the measurable environmental effects and impacts.

The DFO study also claims to have considered the cumulative effects of the project “in combination with the environmental effects of other projects or activities that have been or will be carried out and that have the potential to act cumulatively with the project effects.”<sup>4</sup> However, NRDC found that the report did not adequately assess these broad cumulative effects as it claims. This cumulative assessment is a critical step in determining the environmental impacts of the Wuskwatim Generation Station as the first of a number of planned hydro-power projects in the region. Manitoba Hydro’s 14 dams, 12 generating stations and 12,000 miles of transmission lines, constructed mainly in the 1970s, have resulted in the flooding or clearing of roughly 600,000 acres of boreal forest.<sup>5</sup> Since then, Manitoba Hydro declared that the province’s boreal rivers are “only half exploited”<sup>6</sup> and has announced plans for up to 12 new dams and generating stations on the Nelson and Burntwood Rivers,<sup>7</sup> aimed in part at supplying the U.S. market. At the very least, the whole Churchill River Diversion should be considered as a single project for purposes of environmental assessment and licensing. According to the CEAA, the Minister does have the right to “determine that the projects are so closely related that they can be considered to form a single project.”<sup>8</sup>

Thank you for your consideration of our comments. NRDC requests that the Minister of Environment refer the project for further environmental assessment by an independent review panel. Preferably the Minister will consider the concerns and recommendations from Manitoba’s Clean Environment Commission to assess and license the whole Churchill River Diversion prior to any further generation stations being proposed or assessed.

Sincerely,



Susan Casey-Leffkowitz  
Director, Canada Projects

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<sup>4</sup> *Wuskwatim Generation Project: Canadian Environmental Assessment Act Comprehensive Study Report*, Fisheries and Oceans Canada Central and Arctic Region, October 2005, page 24.

<sup>5</sup> State of the Environment, Manitoba Environment, 1991, p. 108-109. This includes estimates of areas cleared for transmission corridors, roads, quarries, dikes, etc.

<sup>6</sup> *The Hydro Province* (leaflet), Manitoba Hydro Public Affairs, September 2000.

<sup>7</sup> See, [http://manitobawildlands.org/maps/mb\\_gen\\_stations.htm](http://manitobawildlands.org/maps/mb_gen_stations.htm). Dams and generating stations: Notigi (88 MW), Wuskwatim (200 MW), Manasan (270 MW), First Rapids (210 MW), Redrock (250 MW), Whitemud (310 MW), Kelsey Extension (240 MW), Birthday (420 MW), Gull (630 MW), Conawapa (1390 MW), Gillam Island (1000 MW).

<sup>8</sup> Canadian Environmental Assessment Act, 15(2).