



November 17, 2015

Brianne England
Environmental Assessment Branch
Room 486 – 3211 Albert St
Regina, SK S4S 5W6
environmental.assessment@gov.sk.ca

Dear Ms. England,

While we (the undersigned) applaud the direction of Sask Power and the Ministry of Environment in terms of the development of renewable energy resources, particularly that of wind energy, we are also increasingly concerned with the potential siting of these projects. The proposal to build a project in the vicinity of Chaplin Lake is not acceptable for the reasons summarized below.

This lake and the surrounding area is unquestionably one of the most important landscapes for breeding and migratory birds in central Canada. Chaplin Lake is a designated Important Bird and Biodiversity Area by Bird Life International and a Western Hemispheric Shorebird Reserve Network along with Reed and Old Wives Lakes. The Hemispheric designation is ranked by harbouring greater than 500,000 shorebirds annually, including at least 30% of the continental Sanderling population. The site also attracts spring flocks of the Endangered Red Knot and supports as high numbers of nesting Endangered Piping Plovers. The surrounding landscape, commonly referred to as the Missouri Coteau, is a rolling topography containing a high density of wetlands and supports some of the largest concentrations of breeding pairs of waterfowl on the prairies. Ducks Unlimited Canada's (DUC's) Thunder Creek Marshes Project lies to the north of the proposed wind power facility and both Chaplin Lake and the DUC marshes are on the Saskatchewan Heritage Marsh list. The siting of the wind power project is in an area with a relatively high proportion of native grassland that is home to several avian species at risk (e.g. Sprague's Pipit, Chestnut-collared Longspur, Ferruginous Hawk) that may be further impacted by incidental collisions, displacement, or reproductive failure because of the project.

We feel that this project fails to meet statements advanced by Bird Studies Canada whereby; whenever possible, wind energy projects should be situated in areas that are already highly compromised by human development (e.g. areas already impacted by intensive agriculture)



rather than relatively pristine areas, including native grassland, to minimize impacts on both wildlife and their habitats. Wind energy development should avoid natural areas containing populations of species at risk, known migration pathways of national or regional significance, and areas where birds are highly concentrated (e.g. water bird breeding colonies, shorebird and water bird staging areas). The American Bird Conservancy supports “Bird Smart” wind energy, which requires independent, science-based risk assessments leading to careful siting, effective mitigation, independent, transparent post-construction monitoring of bird kills; and compensation if public trust resources are being taken. Bird Smart wind energy is therefore designed to reduce and redress any unavoidable bird mortality and habitat loss.

The Ministry’s Technical Review of the Environmental Impact Statement points out that “the effect on wildlife species is variable and could include increased stress, loss of productivity, habitat or nest abandonment, potentially resulting in changes in distribution and local abundance”. It also touches on the various impacts of construction and operation resulting in habitat fragmentation and loss of connectivity. Of the 79 turbines to be constructed, 34 are to be sited on native grassland, destroying or disturbing 62 ha of natural habitat. As grasslands are the most threatened ecosystem globally, with less than 20% of the remaining natural grasslands left in Saskatchewan, the provincial government cannot allow industrial projects like this on what little remains. Grassland birds are declining and the loss of any additional habitat could result in tipping the balance of already stressed populations of Sprague’s Pipit, Chestnut-collared Longspur or Loggerhead Shrike.

Finally, and perhaps most significantly, the following statement in the Technical Review makes it clear that the reviewers felt that the proponent, Windlectric, did a poor job of collision risk assessment. “Due to inherent uncertainty with all risk assessments and modelling activities, reviewers raised concerns that the assessment for this project may not provide an accurate estimation of the collision risk posed by the project. Reviewers felt bird strikes of stationary objects may not have been adequately accounted for in the assessment. Uncertainty regarding nocturnal migratory behaviour and flight height of many passerine species has resulted in much uncertainty surrounding the risk posed by this project. Nocturnal migratory passerines and raptors have been found to make up a majority of all bird fatalities at wind energy projects. The risk associated with direct impacts may be higher considering the proposed project site supports numerous passerine species some of which are considered sensitive or are listed under SARA (Species at Risk Act)” (Saskatchewan Ministry of Environment, Environmental Assessment Branch, October 2015).



Given these concerns, we ask, on behalf of our thousands of members, that the Minister of Environment withholds all approval and advise the proponent to choose alternative sites that are already disturbed and pose less risk to protected species rather than sensitive and dwindling native grassland and important wetland habitats. Other neighbouring jurisdictions (Montana and Alberta) have undertaken a mapping of high and low impact areas for wind turbine siting. We would be willing to offer our support to aid in this type of endeavour to ensure that the renewable resources our province has the potential to develop can be done in a manner that also considers the protection of our irreplaceable wildlife.

Respectfully,

A handwritten signature in black ink, appearing to read "Jordan Ignatiuk", written over a horizontal line.

Jordan Ignatiuk
Executive Director
Nature Saskatchewan

A handwritten signature in blue ink, appearing to read "Ted Cheskey", written over a horizontal line.

Ted Cheskey
Senior Manager,
Nature Canada

A handwritten signature in black ink, appearing to read "Michael Hutchins", written over a horizontal line.

Michael Hutchins, Ph.D.
Director
American Bird Conservancy