

SUMMARY OF COMMENTS/RECOMMENDATIONS

PROPONENT: Sequoia Energy Inc.
PROPOSAL NAME: Dacotah Wind Energy Project
CLASS OF DEVELOPMENT: 2
TYPE OF DEVELOPMENT: Energy Production
CLIENT FILE NO.: 5176.00

OVERVIEW:

The Proposal was dated February 20, 2006 and was received on February 24, 2006. The advertisement of the Proposal read as follows:

“A Proposal for the Dacotah Wind Energy Project has been filed by Sequoia Energy Inc. for the construction and operation of a 99 megawatt (MW) net electrical generation capacity commercial wind energy facility in the Rural Municipality of Cartier approximately 16 km west of Winnipeg. The development consists of 35 to 70 wind turbine generators and ancillary facilities located on 30 sections of privately owned land across a 25, 000 acre Project Area in the Dacotah area near Elie, Manitoba. An Environmental Impact Assessment (EIA) prepared by TetrES Consultants Inc has been filed in support of the Environment Act Proposal. Site preparations and initial construction is expected to begin in October 2006 with the final in-service date targeted for December 2007.”

The Proposal was advertised in the following newspapers:

Headingly Headliner – March 10, 2006;

Central Plains Herald Leader –March 11, 2006

The Proposal was made available for public review at the following locations:

Main Registry/Winnipeg Public Library/Manitoba Eco-Network (Wpg);

Portage la Prairie City Library & R.M. of Cartier (as Registry)

It was also distributed to the "Energy Production" TAC members for comment. All comments were requested by April 13, 2006.

PUBLIC RESPONSE

Comments received in response to the advertisement supportive of the proposal:

Letters

Lynn Kauppila Chief Administrative Officer R.M. of Cartier P.O. Box 117 Elie, MB R0H 0H0	-dated March 22, 2006
Richard Desilets President Elie Chamber of Commerce Box 175 Elie, MB R0H 0H0	-dated March 22, 2006
Dale Fossay Starbuck, MB R0G 2P0	- dated January 12, 2006
Dennis Rice Box 105 Starbuck, MB R0G 2P0	-dated January 16, 2006
Donna Fossay Box 27, Group 165, RR #1 Dugald, MB R0E 0K0	-dated January 12, 2006
Estelle Thornson General Delivery Starbuck, MB R0G 2P0	-dated January 12, 2006
Henri Alarie Apt 105 233 Booth Drive Winnipeg, MB ReJ 3M4	- dated January 14, 2006
Herb and Shirley Weidman General Delivery Elie, MB R0H 0H0	- dated January 13, 2006
Kevin and Dianne Rice General Delivery Starbuck, MB R0G 2P0	- dated January 15, 2006

Leonard Hoffer
Starlite Colony farms Ltd
General Delivery
Starbuck, MB R0G 2P0 - undated

Max Kendell
120 – 1000 Wilkes Ave.
Winnipeg, MB R3P 2S3 - undated

Brenda Borley and Greg Shirliff
No Time Farms Ltd.
General Delivery
Starbuck, MB R0G 2P0 - dated January 13, 2006

Raymond Rivard
General Manager
Valmar Airflo Inc.
Box 100, 70 Main St. E.
Elie, MB R0H 0H0 -dated January 16, 2006

Comments received which express concerns with respect to the proposal are as follows:

Gaile Whelan Enns
Director, Manitoba Wildlands
1000-191 Lombard Ave.
Winnipeg MB R3B OX1 - letter dated April 12, 2006

- No public EA guidelines/standards for wind energy projects in Manitoba.
- The Dacotah Wind Energy Project may become subject to staged licensing for any future expansion.
- Standards are required which detail to the public how other agencies and departments are responsible for related infrastructure on wind projects.
- Information contained in wind project EA's should not be confidential.
- Public notice for open houses and access to information prior to construction has not been adequate.

Disposition: On May 8, 2006 the Director of Environmental Assessment and Licensing provided a letter of response advising that the comments would be filed on the public registry and would be considered in conjunction with the Environment Act review of the Dacotah Wind Project.

Marilyn and Ken Qually

P.O. Box 32
Starbuck, MB R0G 2P0

- letter dated April 25, 2006

Express the following concerns with respect to the Dacotah wind farm:

- Length of time required to turn affected areas farm land back to productive agricultural use.
- Effects on aerial spraying operators, bees and pollination, property values, the ecosystem, wildlife populations, bird habitat and migration “shadow flicker” and noise.
- Conclude that the EA did not thoroughly explore many of the above noted questions.

Carole and Terry Penner
P. O. Box 183
Starbuck, MB R0G 2P0

- letter dated April 25, 2006

Express the following concerns:

- A substantial body of evidence appears to exist in the area of health and safety that was not addressed in the EA. Other environmental impacts in the EA were presented without conclusion, or were discounted.
- Specific areas of concern presented include noise, shadow flicker and strobes, thrown ice and blades, fire, radio/TV interference, socio-economic factors including effects on property values, wildlife, quality of life.
- Conclude that wind farms do not make good neighbours in populated areas and request that their objections be considered during the assessment and review.

Disposition: On April 25, 2006, the Environmental Assessment and Licensing Branch (EA&LB) forwarded the comments received from the Quallys and the Penners to TetrES Consultants with a request for additional information and clarification on the concerns raised in their letters. TetrES provided a response to EA&LB on May 5, 2006. On May 12, 2006 the Director of Environment Assessment & Licensing wrote to the Quallys and the Penners to advise them that a Licence for the project will be issued on the basis of the EA, the ongoing commitment by Sequoia to resolve any outstanding concerns raised in response to the Environment Act review and the additional information provided by TetrES in responding to their concerns. A copy of the additional information provided by TetrES was enclosed for their consideration. On May 25, 2006 the Quallys and the Penners notified the Director of Environmental Assessment and Licensing that the comments provided by Tetres did not adequately address their concerns. Subsequently, on June 1, 2006 Sequoia met with the Quallys and the Penners to discuss their outstanding concerns. As a follow-up to these meetings Sequoia reported to the Environmental Assessment and Licensing Branch that the company is proceeding with the following items:

- Tetres will follow-up with researching birds in the specific areas of concern and will communicate directly with both families as part of their current bird/bat work.
- Tetres will provide a report to Sequoia on the results of the review of the information that Tetres has acquired as a result of the Penners follow-up letter of May 25, 2006.

- Sequoia will relocate a potential turbine location to an area further from view from the Penners residence.

COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:

Historic Resources Request that the proponent contract an archaeological consultant to conduct a heritage resources survey of the proposed wind turbine locations and access roads.

Disposition: Comment can be accommodated as a condition in the Licence.

Agriculture, Food and Rural Initiatives (MAFRI) Support the project on the basis of positive environmental impact and income diversification opportunities.

Transportation and Government Services Comments are as follows:

- Permits are required from T&GS under The Highways and Transportation Act to construct or modify access driveways onto Provincial roadways and for the placement of any structures within adjacent control areas.
- Permits are required from the Highway Traffic Board (under The Highways Protection Act) for any accesses or structures within the Provincial Trunk Highway (PTH) No.1.
- All proposed overhead and buried power lines will be reviewed to ensure their location meets T&GS guidelines.
- existing drainage patterns along Provincial highway right-of-way should be maintained.
- detailed design drawings for works proposed adjacent to Provincial roadways should be forwarded to Departmental staff for review and approval.
- provide MT&GS staff to be contacted with regard to T&GS requirements.

Disposition: This information will be communicated to the proponent in the License letter of transmittal for direct follow up by the proponent with T&GS.

Conservation (Policy Coordination Branch) Recommend the following:

- A bat and bird survey should be carried prior to construction. Bird surveys should be conducted in mid to late June.
- Towers should not be located closer than one kilometer from the LaSalle River to minimize the mortality to birds including nesting waterfowl that use the river corridor habitat.
- the proponent inspect the site for the presence of any rare and endangered species of concern prior to and during construction in accordance with the Manitoba *Endangered Species Act* and the federal *Species at Risk Act*. If species of concern are present, the proponent is required to contact the Biodiversity Conservation

Section of the Wildlife and Ecosystem Protection Branch to discuss possible mitigation options.

Disposition: The Proposal EIA states that the proponent intends to develop an Environmental Protection Plan (EPP) for the development. The requirement to provide an EPP will be included as a condition of the Licence. The recommendations to undertake a bird and bat surveys areas and carry out an inspection of the project area prior to and during construction can be accommodated as specific requirements of the EPP. A specific setback distance prescribed by a condition of the License may not be practical or feasible. Instead, setback distances between WTG structures and the LaSalle River shall be determined for each WTG in consultation with Manitoba Conservation Wildlife staff. A copy of the detailed comments have been provided to the consultant for consideration in developing appropriate survey methodology and mitigation in the EPP.

Water Stewardship Recommend the following:

- adherence to the *Manitoba Stream Crossing Guidelines for the Protection of Fish and Fish Habitat* during construction including:
 - consultation with the Regional Fisheries Manager in the selection of crossing locations and types.
 - no instream work between April 1 and June 15
 - scheduling any instream work after June 15 in erosion prone areas during dry periods.
 - if possible, crossings with a defined channel and water throughout the year should be directionally drilled.
- Any dewatering required during construction requires authorization at each location by the Water Licensing Branch.
- The Environmental Protection Plan (EPP) should describe the methods to be used to collect baseline data to assess changes to water quality during operation.
- The LaSalle Redboine Conservation District should be consulted with regard to a watershed inventory of the area sponsored by the CD.

Disposition: Comments can be accommodated as conditions of licencing.

Canadian Environmental Assessment Agency (CCEA)

Based on responses to the federal survey, an environmental screening under the Canadian Environmental Assessment Act maybe required for the project. DFO and Transport Canada have requested additional information before they can make a determination on assessment requirements. Specifically, DFO has requested further information on location and impact of any water crossings, road routes, drainage, mitigation for surface and groundwater protection, and description of any water supply requirements and potential impacts. Transport Canada requires additional information in order to evaluate any proposed activities on navigation. Health Canada and Environment Canada indicated that they do not require an environmental assessment under CEAA. Natural Resources Canada

has not responded to the federal coordination request and NR Can's role as a potential funding interest and responsible authority under CEAA is unknown.

Disposition: The proponent is responsible to meet DFO and Transport Canada requirements pursuant to the Fisheries Act and the Navigable Water Protection Act irrespective of The Environment Act licencing process. Comments have been forwarded to the project proponent for follow-up, as appropriate, and in accordance with the requirements of the Canada – Manitoba Agreement on Environmental Assessment Cooperation.

PUBLIC HEARING

A public hearing is not recommended for this project on the basis that the majority of responses received in response to the Environment Act advertisement of the Proposal were supportive. Only one request for a public hearing was received. This individual was notified that a public hearing would not be recommended on the basis of one request and that the decision to not recommend a hearing can be appealed to the Minister of Conservation. The hearing decision was not appealed.

CONCLUSION AND RECOMMENDATION:

The comments received from the technical review of the Proposal can be accommodated as conditions of licencing. It is recommended that the project be licenced pursuant to the Environment Act in accordance with the terms and conditions described in the attached draft Environment Act Licence.

PREPARED BY:

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June 8, 2006
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