



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Robert D. Heggie
Chief Executive,
Alberta Utilities Commission,
Fifth Avenue Place, Fourth Floor, 415 First Street SW,
Calgary, AB
T2P 3L8
robert.heggie@auc.ab.ca

December 1, 2011

Dear Mr. Heggie

Re: Consultation on Wind-power Generation Regulatory Permitting

Please accept this letter as the official response from Alberta Wilderness Association (AWA) to AUC's Consultation on Wind-power Generation Regulatory Permitting (Bulletin 2011-25).

While initially encouraged to see that AUC was willing to consult with stakeholders around the regulations and permitting of wind power generation in Alberta, AWA was very disappointed at the narrow scope of the discussion planned December 12 and 13, 2011, at the AUC's Calgary office. Unfortunately, the *Summary of issues* provided in Bulletin 2011-25 is wholly incomplete. While AWA believes that there are a number of issues which need to be discussed around the regulatory permitting of wind power, none of these are included in AUC's *Summary of issues*, so AWA has decided not to attend the two-day meeting. Instead we wish to highlight the following outstanding issues which we feel should have been discussed at the meeting, and still need to be discussed.

These include:

- **Wind turbines and native grasslands.** The current regulatory process does not adequately ensure that remaining native grasslands are avoided in wind energy development. A good starting point for discussion would be the attached document, *Recommended Principles and Guidelines for Minimizing Disturbance of Native Prairie from Wind Energy Development* published by the Foothills Restoration Forum and Native Prairie Working Group in May 2011. As AUC staff participated in the preparation of this document, it is surprising that Bulletin 2011-25 does not identify this as a significant issue.
- **Footprint of wind generation.** How to minimize the footprint. How can the regulatory process determine where development is appropriate and where it is not appropriate? What are the

maximum densities of wind turbines? What are the maximum densities of other wind infrastructure?

- **Cumulative impacts.** How can the regulatory process manage the cumulative impacts of wind energy development when considered in association with other developments (industrial, agricultural, municipal) taking place on the same landscape. This is a key element of the province's Land-use Framework: one single sector cannot manage its own footprint in isolation of other sectors.
- **Public interest.** There are undoubtedly issues around how effectively the public interest is represented in the current regulatory process, and AWA believes this representation must be enhanced. Wilderness and wildlife need to receive better representation in the regulatory process; opportunity and funding for full public and peer review of environmental studies would help to improve this process.
- **Bird and bat mortality** and wind turbines must not be taken lightly. We are aware there are growing concerns from the public about mortality rates from wind turbines in Alberta. AWA is not convinced this issue is given full or appropriate consideration.

Because of shortcomings in the current regulatory system for wind energy development, organizations such as AWA are increasingly being forced to oppose wind development, and there is growing frustration within the environmental community because this does not need to be the case. There is an urgent need for meaningful participatory discussions that include the vital issues detailed above, and AWA is willing to participate in such discussions.

Yours truly,

ALBERTA WILDERNESS ASSOCIATION



Nigel Douglas,
Conservation Specialist

cc: Honourable Ted Morton, Minister of Energy - foothills.rockyview@assembly.ab.ca

cc: Brian Shand - brian.shand@auc.ab.ca

cc: Raymond Lee - raymond.lee@auc.ab.ca