

ADVICE REGARDING WIND RESOURCE DEVELOPMENT IN THE MKMA

BACKGROUND

There is not unanimity on the Board regarding the appropriateness of wind resource development in the Muskwa-Kechika Management Area. (MKMA)

Wind resource development was not foreseen when the three LRMPs that resulted in the MKMA were written, so no industry-specific guidance was given for Wind Resource Development.

The Preamble to the Muskwa-Kechika Management Area Act notes the requirement that “long term maintenance of wilderness characteristics” and “the long-term objective is to return lands to their natural state as development activities are completed”.

Some Board members believe Wind Resource development for power generation increases the likelihood of permanent “footprint” or, at a minimum, having a multi-generational footprint that by definition renders it incompatible with the intent of the Act’s Preamble. They also believe that the sight of wind towers, powerlines and access roads would have an impact on the MKMA’s wilderness values - particularly where the towers would be visible at a distance on the gentler, windy ridges on the eastern margins of the MKMA which tend to have greater recreation use than many other areas of the MKMA. Concerns also exist on the potential effect on caribou and other species of management concern including the potential for increased predation.

Other Board members interpret the Preamble of the Act as not precluding this type of activity and do not agree that the absence of the mention, and attending guidance, of Wind Resource development in LRMP’s bars their consideration in the MKMA today.

They also believe that the concerns raised can be managed and the potential impacts mitigated through specified conditions leading them to the opinion that Wind Resource development may proceed in a portion of the MKMA.

RECOMMENDATIONS

- 1) Defer any wind resource development (including permitting) proposals and/or considerations until learnings on the potential impacts to Caribou and other species of management concern emerge from Wind Resource development(s) in similar terrain, topography and wildlife habitat quality.
- 2) If, because of Recommendation 1, government interprets the Act’s Preamble in a manner that deems Wind Resource development may proceed somewhere in the MKMA the Board offers the following additional advice:
 - i. If as a result of Recommendation 1, learnings indicate that Wind Power development in the MKMA will likely have significant and persisting negative impacts to Caribou and other species of management concern as well as to Wilderness Quality and Characteristics then a moratorium on any Wind Development in the MKMA be imposed;
 - ii. If a statutory decision maker decides to consider a Wind Resource development proposal, despite (i), that he/she still fully consider and recognize the significance and weight of the concerns and impacts identified in (i) in his/her deliberations;

- iii. Further, the development proposal under consideration be restricted to the Eastern edge of the MKMA and that no other Wind Resource developments be considered in the MKMA;
- iv. Further, the statutory decision maker considers, to the extent practicable, negating the potential for additional access to the proposed development site under consideration by imposing access control as close to the Alaska Highway as possible;
- v. Further, the statutory decision maker should, to the extent practicable, require that transmission lines from the proposed development site under consideration follow the approved access corridor to the site;
- vi. Further, the statutory decision maker, should require the proponent to undertake a Visual Quality Inventory and Assessment and use that information to mitigate the proposed development;
- vii. Further, the statutory decision maker should require that public access to the proposed development site be restricted 24 hours/day, every day;
- viii. Further, the statutory decision maker should impose a time limit to the life of an approved project (via a “sunset clause” for example);
- ix. The proponent should pay an annual levy (to be determined with ministry officials) that should be dedicated to the management of the MKMA; and
- x. The proponent should provide bonding to ensure project removal and reclamation at the end of the project’s life.