



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

March 23, 2011

Alberta Utilities Commission
Facilities Division
Fifth Avenue Place
4th Floor, 425 – 1st Street S.W.
Calgary, Alberta, T2P 3L8
Attention: Douglas A. Larder, Q.C., General Counsel

Alberta Environment
Regulatory Approval Centre
9th Floor, 9820 – 106 Street
Edmonton, AB, T5K 2J6
Attention: Director Central Region, Director Northern Region

filings@auc.ab.ca

Dear Sirs:

**HR Milner Power Plant Expansion Project – Grande Cache Area
Application 1604766
Proceeding ID 203
Statement of Concern and Letter of Objection.**

Please accept this letter as a Statement of Concern regarding Alberta Environment Application No. 012-9814 and a Notice of Objection to AUC Application number 1604766 on behalf of the Alberta Wilderness Association (AWA).

AWA requests that the AUC convene a public hearing to consider this application. We would further suggest that any such hearing be coordinated with any federal hearing on this matter.

AWA objects to the application by Maxim Power Corp. for approval under the *Hydro and Electric Act* to construct and operate a coal-fired 500MW power generating unit at its existing HR Milner facility site in the Grande Cache area for the following reasons.

1. In-stream flow needs of the Little Smoky River

Construction of a temporary storage area related to a new water intake would lead to unacceptable impacts on the riparian habitat and fisheries of the river. AWA opposes the

extraction of approximately 6 million m³ of fresh water annually (a substantial increase in water consumption from the current rate of 1 million m³/year) and discharge of wastewater into the Little Smoky River. The proposed project will require authorization under Section 35 of the *Fisheries Act*.

2. Greenhouse Gas Emissions and Climate Change

The proposed project is expected to release 3.01 MT a year of CO₂ equivalent based on an emission rate of 762 kg CO₂e/MWh. The burning of coal represents the largest source of GHG in Alberta. There are alternatives that produce significantly lower GHG and other air emissions.

3. Lack of Cumulative Impacts Assessment for this region

AWA has repeatedly called for a public inquiry into the incremental developments in this region. We firmly believe no new developments should proceed without an inquiry into the cumulative impact mining and other resource extraction operations, the power generation plant and proposed expansion will have on the ecological integrity of this area. Coal mining has been a major anthropogenic disturbance in this region; however we believe other interests and issues must be brought to the forefront and considered with respect to resource management. A public inquiry would facilitate the acknowledgement and consideration of a wide range of interests and help government officials in planning for this area. Through a full and accountable public inquiry, the Alberta government which holds this land in trust for its citizens can sponsor an important public debate about what management direction will best further the public interest.

Alberta Wilderness Association

Alberta Wilderness Association is the oldest wilderness conservation group in Alberta dedicated to the completion of a protected areas network and the protection and conservation of wilderness areas in Alberta. AWA is registered in Alberta under the *Societies Act* and is federally registered as a charitable organization.

Since its beginnings in the 1960s, AWA has focused on the health of Alberta's watersheds, wild rivers, and wetlands, which are considered integral to the maintenance and well-being of all Albertans, including wildlife. AWA contributed to the development of conservation provisions in the *Water Act*, enacted by the Alberta government in 1990s.

For more than 30 years, AWA has been involved in protecting watersheds in Alberta. AWA participated in the development of the Eastern Slopes Policy to protect source watersheds. AWA spoke out against inter-basin water transfers and played a critical role in bringing the Canadian Heritage River System program into Alberta.

Currently, Carolyn Campbell, Conservation Specialist with the AWA, sits as a director of the Alberta Water Council and has been involved through the Council in investigating issues related to water transfers, water allocation, aquatic ecosystems, river corridors and wetland policy. Also, AWA is an active member of the Alberta Environmental Network Water Caucus.

AWA's participation in such processes is essential. We advise our members, the public and other environmental groups regarding the management, allocation and conservation of water resources.

We feel that AWA is directly affected as we have members who reside in the local area and their use and enjoyment of the Smoky River may be adversely affected by the proposed Application.

AWA requests that the AUC convene a public hearing to consider this application as stated earlier in this letter, we would further suggest that any such hearing be coordinated with any federal hearing on this matter.

Yours truly,

ALBERTA WILDERNESS ASSOCIATION

Christyann Olson
Executive Director