

January 31, 2025

Honourable Randene Neill
Minister of Water, Land and
Resource Stewardship
Parliament Buildings
Victoria, BC V8V 1X4

Dear Randene Neill:

RE: Wrong time to Change the Environmental Review Process for Wind Power Projects

According to the B.C. Environment Ministry, up until recently, wind projects generating more than 50 megawatts of power or involving 15 or more turbines have been subject to an environmental assessment through the BC Environmental Assessment Office (BCEAO). The Ministry has stated that wind projects have typically taken one to two years to complete the environmental assessment process — although no wind projects have been reviewed since B.C.'s Environmental Assessment Act was updated in 2018.

An important feature of the environmental assessment process is to analyze valued components (VCs) (either environmental, social or economic) that may be affected by the wind project. In past wind power projects, VCs assessed have included atmospheric environment, geology, terrain stability and soil, hydrology and water quality, vegetation, wildlife and wildlife habitat, fish and fish habitat, transportation, archaeology, culture and heritage and resource use, socio-economic and health. Further, the process identifies the significant effects the project may incur and maps appropriate mitigation pathways. The overall goal of the environmental process is not to stop projects but to ensure that harms identified are mitigated.

The province has indicated that it needs these projects up and running as quickly as possible, and to do this it will be moving approvals through the “one window permitting approach” overseen by the Ministry of Water, Land and Resource Stewardship, with input from BC Hydro; while other ministries will provide support to ensure “coordinated and efficient consultation with First Nations,” public engagement and efficient and transparent decisions.

However, it might be worth reminding the Province that currently the BC Environment Assessment office is the only agency that has experienced staff and the expertise to conduct environmental assessments efficiently. Shifting a new process on ministries that have never had this role, or responsibility suggests a lack of understanding of how the on-the-ground overall coordination of an assessment really works. Also, removing the independent oversight of the BCEAO to “make the process go faster” looks politically motivated and risks removing the transparency and clarity the environmental process requires.

Further, it is not clear that time savings can be achieved as delays will be likely as new departments become familiar with their role and hire the necessary staff. This risks “streamlining” being seen as a way of not doing anything and simply skipping over the process, keeping fingers crossed that no issues occur down the road.

Eliminating the BCEAO and established environmental assessment processes because the Province has not been properly planning and investing in its energy security is not a good look, and could harm the reputation and public confidence in the wind power sector moving forward. Getting it right the first time is important.

If the province would like to update and streamline its environmental assessment process, it should do that. But before it decides to remove the experience of the BCEAO, it might want to reflect on the experience provided by BC Hydro being allowed to skip the investigation of alternatives on its Site C project in which BC Utilities Commission recommended an investigation of alternatives. In the case of Site C the costs eventually ballooned to \$16 billion and has become the most expensive energy project in BC’s history.

There is a reason why we have established due process for major projects. Short cuts at this stage are not the best way to begin this new round of electricity projects. Let’s maintain the transparency, trust and completeness of the process that BC has worked so hard to establish.

Sincerely,

A handwritten signature in blue ink, appearing to read 'RS', with a stylized flourish at the end.

Randy Sunderman, Director Kamloops Area Preservation Association

Cc: Ward Stamer, MLA Kamloops North Thompson
Jeremy Valeriote, MLA Vancouver-Sea to Sky