



Wild Sheep Society of British Columbia  
#101-30799 Simpson Road  
Abbotsford, BC V2T 6X4

November 27<sup>th</sup>, 2023

FrontCounterBC Cranbrook  
1902 Theatre Rd.  
Cranbrook, BC V1C 7G1

***Regarding: Crown Land File #4406427  
Enterprise Renewable (2017) Ltd, Windpower – Investigative Phase***

To Whom it May Concern,

The Wild Sheep Society of British Columbia is deeply concerned about Enterprise Renewable (2017) Ltd, Windpower – Investigative Phase application specifically labelled Crown Land File #4406427. Numerous polygons have been designated for consideration in the Investigative Phase, which, if Solar Farms were approved, would ultimately lead to wide-spread solar panel placement in high-value habitat for wild sheep, other ungulates and multiple Species at Risk. The Wild Sheep Society of BC is opposed to this Investigative Stage and any other development of high value habitat in the heart of ungulate winter range.

Whilst we recognize that land disturbances during the Investigative Stage are anticipated to be relatively minimal, the real concern is that permitting even an initial stage to proceed will give the entire endeavor momentum that is likely to result in large scale industrialization of critical habitat for numerous species including those that are listed as Species at Risk. These include Lewis' Woodpeckers and Long-Billed Curlews. Increased disturbances on the landscape with the installation of monitoring equipment would disrupt an already fragile ecosystem that has been affected by other industrial developments.

The polygons identified will negatively impact numerous species as they are in and around areas with a Conservation Lands designation. The polygons include important winter range for numerous species of ungulates and include Bighorn Sheep habitat in the case of the Elko polygon.

Further to the above, we are incredibly concerned that a subsequent stage resulting in the potential installation of solar panel farms would be devastating to wildlife in and around the polygons. These installations inevitably include exclusion fencing which would severely impact many species in that area - a phenomenon that is already ubiquitously apparent with the extensive high fencing of low-lying graze lands occurring throughout the Kootenays which already excludes ungulates from vast expanses of critical winter forage. The WSSBC holds that wildlife in the region cannot sustain any further hits of this nature.

Specific Wild Sheep Society of British Columbia's concerns include:

- The polygons chosen are Wildlife Habitat Areas for Lewis' Woodpecker (Threatened, SARA) (Blue, BC), Long-billed Curlew (Special Concern, SARA) (Blue, BC), Common Nighthawk (Threatened, SARA) (Yellow, BC) and American Kestrel, American Badger (Endangered, SARA) (Endangered, BC) as well as critical habitat for Deer, Elk, and Bighorn Sheep.



- Cumulative effects on wildlife, as there are numerous industrial disturbances in the area. In fact, in 2016/2017 there were eight other applications relating to solar energy from SB Solar Holding and Innergex Renewable Energy. Public information has been limited on the outcome of these proposals. Without question the cumulative effects has severe impacts to ecologically sensitive wildlife and needs to be considered.
- With exclusion-fencing, wildlife is severely impacted, in particular, wild sheep that require connectivity. Bighorn Sheep, for example, require connective habitat to transition between summer and winter range. Additionally access to escape terrain when pressured by predators is important for the species. Highways, fencing and other restrictive human imposed impediments all impact wildlife. The loss of this prime habitat to exclusionary fencing would affect wildlife resident in the polygon, but beyond that for all species that use the area for connectivity.
- The harm resulting from displacement of wildlife due to increased industrial activity, and in particular, exclusionary fencing cannot be overstated. For example, elk that may frequent a specific polygon area could be displaced to new habitat that was traditional habitat for Bighorn Sheep. The outcome is these two species competing for a limited and decreasing amount of habitat negatively impacting wildlife populations.

To be sure, Bighorn Sheep and other species will be adversely impacted by the Investigative Stage of Crown Land File #4406427. However, the bigger threat to wildlife within these polygons and surrounding areas is, without question, the establishment of a solar farm facilities. The Wild Sheep Society of British Columbia opposes this Windpower – Investigative Phase application (Crown Land File #4406427).

In addition to our opposition of the Investigative Stage of Crown Land File #4406427, we are also requesting a provincial policy precluding the establishment of Solar Farms in high value wildlife habitat areas. There are plenty of opportunities for solar panel placement in areas where wildlife is not as broadly impacted. Examples of this include gravel pits, abandoned mine sites and other areas heavily impacted by industry and development. It is imperative that a critical irony not be overlooked: the entire purpose of renewable energy sources, such as wind and solar power, is to avoid detriment to the natural world. It is therefore patently absurd to even consider a renewable energy project that stands to harm critical wildlife habitat.

For the avoidance of any doubt, we oppose Crown Land File #4406427.

The Wild Sheep Society of British Columbia thanks you for considering our comments. We would welcome any opportunity to consult with you on this issue and I can be reached directly at 250 619-8415 or email at [kstelter@wildsheepsociety.com](mailto:kstelter@wildsheepsociety.com)

Yours in Conservation,

Kyle Stelter  
*Chief Executive Officer*