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Ms. Doris Dumais  
Director – Approvals Access and Service Integration Branch  
Ministry of Environment  
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Toronto, ON M4V 1L5  
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Dear Ms. Dumais

RE: Windlectric REA Application – Amherst Island  
Incomplete and Deficient Noise Report

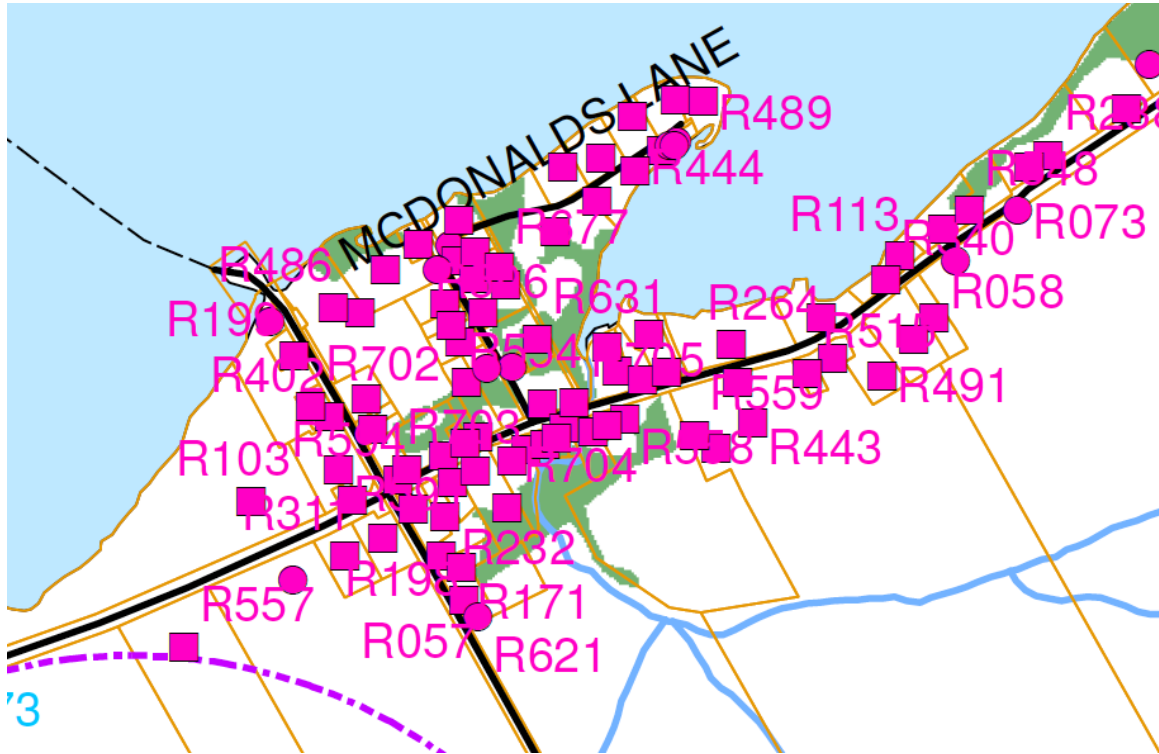
I am assisting community members on Amherst Island to understand the implications of the proposed project for their property and in particular to become familiar with their receptor number and the related tables for noise and shadow flicker projections. I simply couldn't understand why Islanders could not match their property with the Receptor number shown in Windlectric's documents especially because this is a very literate and informed community.

My goal was simple: to prepare a one pager showing receptor number, street address, shadow flicker, and noise contour for each property on the Island so that Islanders could make informed comment about the impact on their property.

**The task is simply impossible given the incompleteness, omissions and poor quality of the work submitted by Windlectric and its consultant Hatch Ltd. Consequently, I request that Windlectric's REA application for Amherst Island be rejected as incomplete.**

For example, even when significantly magnified (800%) as shown in the extract below and with the help of a Professional Engineer, it is impossible to relate property boundaries and specific locations to receptor numbers on the map provided by Hatch in its report "Windlectric Inc. Noise Assessment Report for Amherst Island Wind Project H340642-0000-07-124-002 Rev 3 November 28, 2012" and embodied in the Amherst Island Wind Energy Project Design and Operations Report prepared by Stantec dated

December 2012 all of which was submitted in support of a REA application by Windlectric.



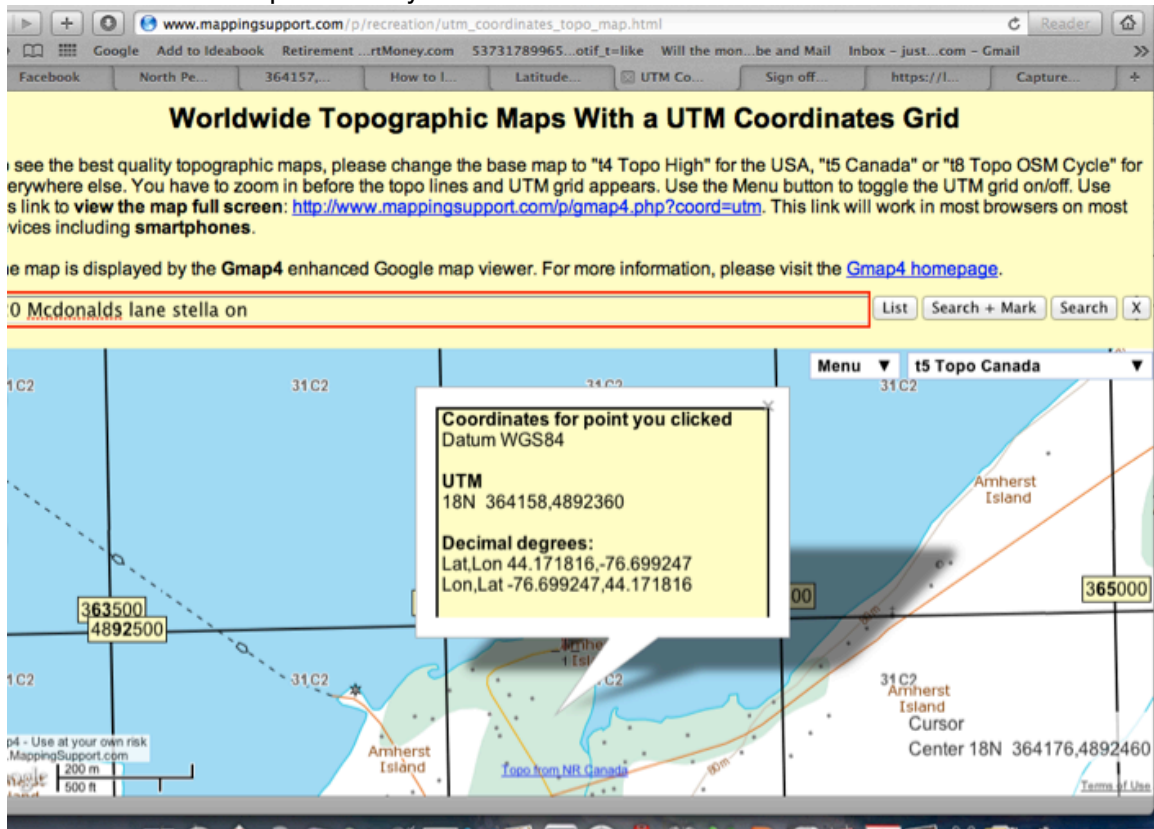
There is no match between the quantity of receptors and the “R” numbers shown by the receptors. The size of the dots/circles and the R numbers do not match the map scale and consequently it is impossible to make sense of the information. In my best effort to help residents understand the impact on Stella we tried to simply look at a range of R numbers but the Receptor numbers seem to be randomly assigned such that R631 is in close proximity to R264. While the map is already unreadable, using the same colour for the Receptor numbers and the dots/circles exacerbates the problem.

So then I tried to relate UTM coordinates

For example, Receptor 631 shown in the Table below:

Noise Receptor ID	Description	UTM NAD 83, Zone 18		Nearest source distance [m]			Sound pressure [dBA]						
				WTG		Sub-station	POR at 4.5 m			POR at 1.5 within 30 m			Limit
		X	Y	Distance	ID	Distance	Substation	WTGs	Total	Substation	WTGs	Total	
R631	Existing	364157	4892328	967	S06	1519	27.9	35.5	36.2	25.5	33.2	33.9	40.0

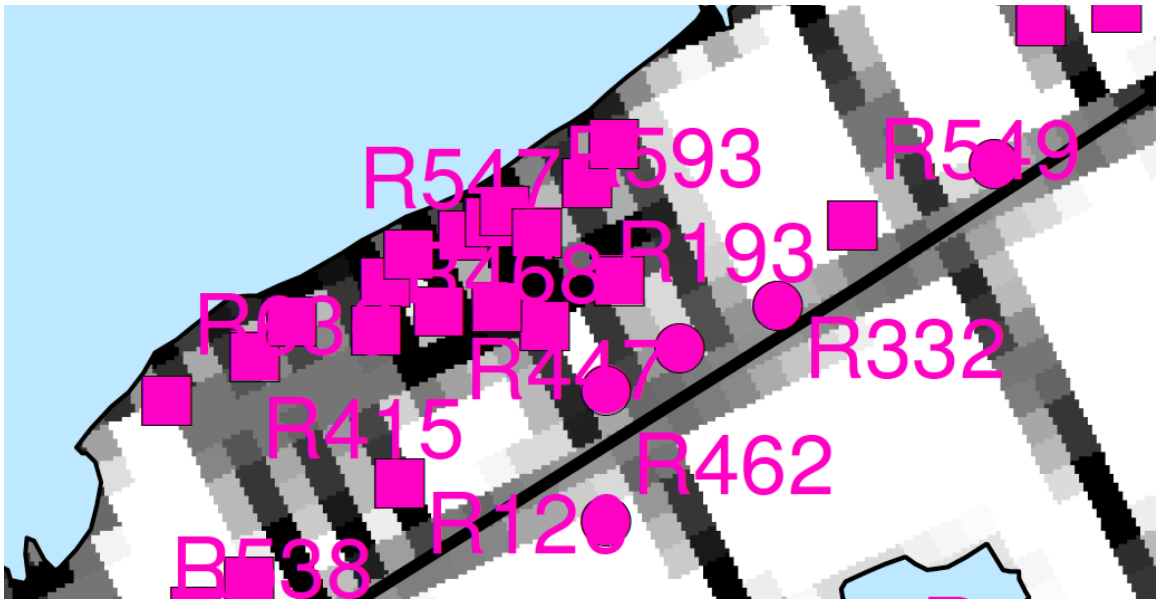
I appreciate that the screen shot below is not an exact match as I was unable to position the cursor to the level of accuracy required and the datum is different but I believe the result demonstrates that it is impossible for the normal mortal to match their property with the information provided by Winlectric/Hatch.



What is needed is a table listing emergency or street address with the noise and shadow flicker information. Be assured we also tried to use MPAC's assessment roll information and realtor files. It simply can't be done!

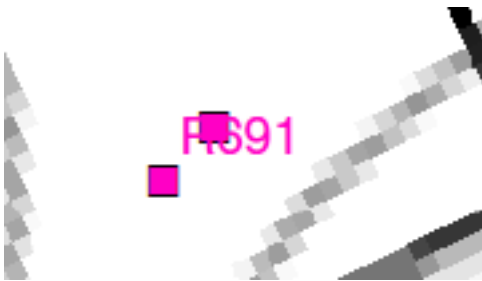
It is similarly impossible to verify the distance from the Receptor to the nearest turbine based on the information provided in this report.

And it's not just Stella Village, other areas of the Island are equally unreadable even at 800% magnification:

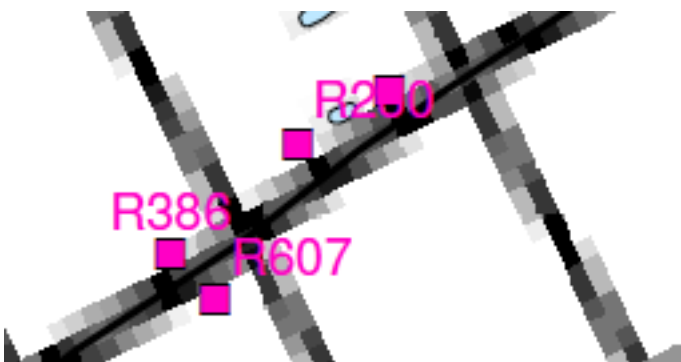


In addition to the Receptor numbers being illegible in multiple places, there are Receptor numbers without dots and dots without Receptor numbers.

Example 1



Example 2



Example 3



Based on the information provided it is impossible to determine if the setbacks comply with the legislation, whether the Receptors for vacant lands have been sited in accordance with the regulations, and what the impact on individual properties is.

While not required as part of the REA process, the shadow flicker is similarly incomplete and deficient. For example, Receptor 617 has the highest number of hours of shadow flicker per year but has no hours per month or week and is not shown in the appropriate colour zone on the map.

Amherst Islanders deserve better particularly as the proponent has designed the project such that 80% of the homes will be within 1 decibel of the MOE standards for noise compliance. This is not a modeling exercise. The proponent is required to provide accurate and comprehensive information and the “supporting information must be organized in a clear and concise manner” as set out in the MOE publication “Noise Guidelines for Wind Farms Interpretation for Applying MOE NPC Publications to Wind Power Generation Facilities”:

**6. NOISE ASSESSMENT REPORT**

A Noise Assessment Report must be prepared for all proposed Wind Farms. The requirements for a detailed noise impact assessment depend on the proximity of the Wind Farm to receptors and are described in Section 6.4. The report must be submitted in a hard copy as well as in an electronic format.

The Noise Assessment Report must demonstrate compliance with the applicable sound level limits and the supporting information must be organized in a clear and concise manner. The report must be prepared by a qualified acoustical consultant and the cover document must be signed by the proponent for the project.

Please reject the Windlectric REA application as incomplete and deficient.

Thank you for your consideration. I look forward to your timely response.

Sincerely

Deborah Barrett

CC Mr. J Bianchini, CEO, Hatch Ltd.  
Mr. I. Robertson, Director, Windlectric  
Mr. K. Moore, Chair, Board of Directors, Algonquin  
Mr. K. Strobele, Chair, Hatch Ltd.