

Mr. Rob Nadolny
Senior Project Manager
Stantec Consulting Ltd.

Dear Sir,

CEAR 04-04-4667 Wolfe Island Wind Turbine Project: ERR

The purpose of this letter is to draw attention to my concerns about statements in the Environmental Review Report (ERR) released by Stantec in support of the proposed Wolfe Island Wind Turbine Project.

I have reviewed the section pertaining to the projected cumulative effects of the project with regard to certain and reasonably foreseeable activities at a regional level (ERR 8.1). I am concerned that the proponent has not considered the proposed Amherst Island Wind Turbine Plant within the zone of influence for the Wolfe Island ERR. I also contend that cumulative effects of wind turbine developments in other Important Bird Areas (IBA) along the northern lakeshore of eastern Ontario should be considered in the ERR. The cumulative effects of turbine projects along the southern and northern shores of eastern Lake Ontario may further alter the environment through nibbling loss and spatial and temporal crowding.

ERR Cumulative Effects

The ERR Cumulative Effects (Chapter 8) refers to the transboundary effects of wind turbine developments in Jefferson County, New York. These projects will result in 200 turbines immediately across from the southern shore of the Wolfe Island Plant and in the midst of a globally significant migratory bird route.

The ERR states that the project on Wolfe Island will result in significant negative effects on populations of raptors. The ancillary and access roads will fragment habitat, nests will be disturbed and the breeding and flight displays of Short-Eared Owls will make breeding pairs highly susceptible to blade strike. The ERR anticipates that the baseline population of Short-Eared Owls will decline and populations will not recover for the life of the project. A similar prediction is made with regard to Rough-legged Hawks. The ERR predicts that Bald Eagles will likely relocate permanently to avoid being "hemmed in" by the more than 200 turbines to be erected in New York and 86 turbines along western and southern shores of Wolfe Island. Mitigation strategies will not prevent the decline of SARA identified species as well as populations of grassland birds and raptors below baseline levels, according to the ERR.

"The negative cumulative effects on avian mortality and migration in the region will be long-term and irreversible" (ERR, Table 8.3 Significance of Cumulative Effects).

Amherst Island and Other Canadian Regional IBAs

Wind turbine Plant projects are proposed for Amherst Island, Wolfe Island, Point Petre and offshore of Prince Edward County. These projects are all sited in and adjacent to Important Bird Areas. This represents large-scale industrial development in all but one of the major Important Bird Areas in Eastern Ontario. Please reference the map of IBA ON152, ON003, ON 037 and ON 062. (<http://www.bsc-eoc.org/iba/regional.jsp?region=ON>)

Amherst Island is situated 4 km east of Kingston and rests between Wolfe Island to the east and Prince Edward County peninsula to the west. Amherst Island is a recognized Important Bird Area and is considered globally and continentally significant with regard to congregatory species (<http://www.bsc-eoc.org/iba/site.jsp?siteID=ON062>). Wolfe Island is the only other IBA Site that is globally and continentally significant with regard to congregatory and migratory birds (<http://www.bsc-eoc.org/iba/site.jsp?siteID=ON037>). Wolfe Island warrants the highest level of concern – Level 4 – according to Environment Canada.

Wolfe and Amherst Islands have gained international recognition for concentrations of wintering hawks and owls that are often present. Amherst Island is one of the few remaining breeding habitats for raptors such as Rough-Legged and Red-Tailed Hawks and owls. Short-

Eared Owls are recognized under COSEWIC to be of Special Concern. Amherst and Wolfe Islands also support grassland songbirds; species with dwindling populations due to habitat fragmentation, according to the Canadian IBA Directory and the Audubon Society (2007).

The Canadian IBA Directory states that Wolfe Island and Amherst Island share the same potential and ongoing threats: disturbance, intensified management, urban and industrial development.

The proponent, Canadian Renewable Energy Company (CREC) has optioned land for a Wind Turbine Plant that can support 100 turbines on Amherst Island. In addition to the Amherst Island project, two Wind Turbine projects are slated for The Prince Edward Point IBA. Trillium Power Energy Corporation has plans for a 140-turbine project offshore in Prince Edward County. Canadian Hydro Development Corporation (Owner of the proponent, CREC) is proposing a Wind Turbine Plant in Point Petre, the Royal Road Project. These projects are sited inside and adjacent to the Prince Edward Point IBA.

Please consider the following questions:

- What would be the cumulative effect of the projects in Jefferson County, New York, (200 turbines), the Amherst Island and Wolfe Island projects (186 turbines) and the Prince Edward Point projects (153 turbines) on the baseline population of Short-Eared Owls, Rough-legged Hawks, and Bald Eagle in the Eastern Lake Ontario region?
- What would be the cumulative effect on other raptor species, grassland songbird populations and migratory birds (including waterfowl)?

The ERR states that migrating waterfowl, grassland birds and raptors will alter migration and other behaviors to avoid large concentrations of turbines. Given the density of turbines projected for the northern and southern shores:

- Where will avian populations find refuge in the region? Can the proponent identify remaining regional habitat suitable for sustaining displaced avian populations?

When combined with the BP Alternative Energy Project and AES Acciona Windpower project in Jefferson County, the Wolfe and Amherst Island and Prince Edward Point projects will result in roughly **575 turbines in the region** over the next five years.

Kingston Economic Development Corporation (KEDCO), an official stakeholder, indicated concerns that the Amherst Island project, owned by the proponent (CREC), be identified as a significant regional activity for consideration in the study. Stantec excluded Amherst Island, describing the project as "not reasonably foreseeable." (ERR Table 8.1) Stantec excluded developments in Prince Edward County, also a concern for KEDCO.

One might inquire about the justification for including Amherst Island in the Visual Change Model when considering negative effects on landscape viewing and not avian mortality. http://www.wolfeislandwind.com/project_docs/Draft_EA_Report/Appendices/C11/C11_Fig1_Amherst_Island.pdf

The CEA boundary for consideration of cumulative effects should be expanded to include Amherst Island and the developments in Prince Edward Point IBA, and should include the potential effects of avian mortality, habitat fragmentation, and changes to migration patterns. The current ERR indicates a significant, irreversible negative effects on avian populations as a result of foreseeable activities in the region. These "foreseeable activities" must include wind turbine projects in development for Amherst Island and Prince Edward Point. Therefore, I respectfully request that the ERR for the Wolfe Island Wind Project be elevated to a panel review according to the federal process and be elevated according to the provincial process.

Leslie Kaduck