

Mr. Rob Nadolny
Senior Project Manager
Stantec Consulting Ltd.
Dear Mr. Nadolny:

This letter is in response to the Wolfe Island Post Construction Follow-up Plan. Thank you for providing the various stakeholders an opportunity to comment. I hope you can make good use of these comments. I am a resident of Amherst Island and have been watching the events on Wolfe Island, obviously wondering if the same decision process will be used for us.

In particular, I've been watching how you've studied and characterized the situation presented by wintering raptors. You know that there are but four good Ontario winter raptor areas, and that Wolfe and Amherst represent two of them. Also, you know you are not able to predict what the impacts of the turbine operation will be upon them.

From your Environmental Review:

"The IBA criteria indicate that Wolfe Island has been designated for the presence of globally and continentally significant "congregatory species" (i.e., wintering hawks and owls) and for continentally significant migratory waterfowl concentrations."

"No information is available regarding the potential for disturbance effects arising from the operational turbines on raptor species or in raptor wintering areas. Disturbance effects during operation may include behavioural modification such as avoidance during flight or displacement from foraging areas."

"Disturbance effects related to habitat and behavioural change are generally considered to be more likely than direct mortality..."

"Due to the concentration of raptors during the winter, there is some risk of potential negative effect, including direct mortality."

From your Mitigation report:

"Little information exists to assess the degree of direct and indirect effects on birds and bats at the Wolfe Island site."

Given the critical nature of these habitats and the uncertainty presented by the project, you'd think someone would err on the side of caution, although I can understand that when there's big money involved there might be a lack of concern for the birds. But at least I hoped for some plans on what you would do if the loss of habitat became a reality. However the Mitigation report contained nothing of value for saving the raptors on Wolfe Island. I don't consider additional monitoring an adequate response to the potential loss of the habitat.

Finally, in the PCFP I find out what your plans for mitigating the loss of Wolfe Island habitat would be. You can imagine my disappointment when I discover that, in effect, you will do nothing to save the habitat on Wolfe Island itself.

From your Post Construction Follow-Up Plan report:

“Significant decline is considered to be a decrease in population to an extent that direct intervention may be required to halt further decline. Significance will be evaluated and considered at the site level. A potentially significant decline of wintering raptors will be defined by an absence of raptors in 50% or more of the areas observed to support raptors during preconstruction surveys.”

...potential responses include:

- expand survey
- mitigation banking
- land donation
- financial contribution

Perhaps you think these are adequate responses, regardless of the lack of any precedents for rebuilding winter raptor habitats. That somehow some organization will be able to take whatever money you decide to give them and rebuild another Wolfe Island with it. Or that maybe “saving” one of the other two Ontario winter raptor “hot spots” will somehow atone for the loss of Wolfe. Or that yet more studies will somehow lead to higher numbers of these magnificent creatures. I’m sure you are aware of (for example) the Sierra Club’s opinion of mitigation banking. To me it is simply a way for you to buy your way out of dealing with the consequences of what you’ve done.

As great as my disappointment is in your actions, it is far greater in the actions of the governments, mostly Provincial but also Federal, who have failed to take any meaningful action to fulfill one of government’s most basic functions – the protection of resources, both human and natural. If I thought it would be useful, I would provide my own set of potential responses. However, my responses would concentrate on actions that would try to save the habitat on Wolfe Island itself, and given the acquiescence of the various governments you’ve got little incentive to take those sorts of actions (like taking multiple turbines out of production for extended periods).

Perhaps I’m wrong about Wolfe’s fate – I certainly hope that the Project is as benign as you claim it will be – but we won’t know until it is too late to do anything about it, and that disregard for consequences is very troubling to me.

Regards,

Wayne Gulden

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