

## Comments of Wayne Gulden to EBR Registry #011-9446

Windlectric's permit application to adversely affect the habitat of three grassland species contains a series of conditions that "would provide benefits that exceed the adverse effects". However as I look through the conditions only one has any potential at all to provide any benefits for the species in question: namely, "securing and actively maintaining an area(s) to create and maintain suitable habitat...".

However, the cost to actually create and maintain a new/replacement suitable habitat would be very large. Amherst Island is about 7000 ha in area. Of that, roughly 3000 ha will be directly impacted (with noise levels above 40 dbA) by the turbines. Windlectric would have to find and procure a similar-sized section of land well within the current range of these species. It would currently not be suitable habitat, like forest or marshes. It would then have to be physically converted into grassland, and then monitored for some period to see if the threatened species actually started using it. Only then could the project on Amherst Island proceed.

The ESA, however, contains a serious, perhaps fatal, flaw in section 17(2)(c). It introduces the concept of "reasonable" into the rules. So under the guise of being "reasonable" all of the protections afforded by the ESA can be thrown out. Windlectric has already argued that not letting them proceed with the project would be unreasonable. They would no doubt argue that the above mitigation - which would be needed if one were actually serious about protecting threatened species - would also be unreasonable. MNR's history indicates that they will agree with Windlectric on both of these points, and that the habitat on Amherst Island will be sacrificed in the name of reasonableness.

It seems that the road to extinction is paved with reasonableness: one reasonable habitat-destroying project after another until the inevitable extinction occurs. And every single project defends itself as not being the cause. How many times must we play this process out? At what point will MNR stop this snipping away at our biodiversity?

Perhaps there are cases where the project is so valuable, at least to humans, that we go ahead regardless of its effects on habitat. The project on Amherst Island is not one of these. Even Canwea makes no claims for emissions savings of Ontario wind projects. If this project does not happen the only losses will be financial for the participants, and those losses will be everyone else's gains. So "reasonableness" in the end is driven by the money transferred into their pockets. Is this what the MNR now kowtows to? Is that how you interpret your mission? To give large corporations the ability to sacrifice our habitat for their profits?

If the MNR is truly serious about protecting the habitat of these species you will require Windlectric to perform the mitigation as specified above. Anything less than that would show the world that, in spite of all your righteous verbiage about protecting nature, when push comes to shove you really don't care.