

✿ Judith Jones ✿

Kirsten Walli, Secretary
Ontario Energy Board
P.O. Box 2319
2300 Yonge Street 27th Floor
Toronto, Ontario M4P 1E4

BY FAX

**RE: Application by Maclean's Mountain Wind LP for transmission facilities
FILE # EB-2011-0394**

Dear Ms. Walli:

I am writing regarding the notice of the application to construct transmission facilities for the Maclean's Mountain Wind Farm. I have several concerns with the proposed route of the transmission line, and potentially with the location of the transmission facility on Goat Island. My concerns stem from species-at-risk that are present on the alvars in the areas in question. Alvars are a globally rare ecosystem with few trees, dominated by grasses, sedges, and low shrubs, with shallow soil over limestone bedrock.

I have been researching alvar ecology since 1995 and am the author of a number of papers on the workings of and threats to this ecosystem. I have also authored federal recovery strategies and a status report to the Committee on the Status of Endangered Wildlife in Canada (COSEWIC) for several endangered and threatened plant species that are only found on alvars. As part of my work in this area, I have surveyed and mapped most of the alvars in the Manitoulin District and am probably the most knowledgeable expert on the alvars and alvar species of the region.

There are at least two and possibly three species at risk present in the proposed transmission corridor. They are: Gattinger's Agalinis (*Agalinis gattingeri*—endangered federally and in Ontario) and Houghton's Goldenrod (*Solidago houghtonii*—threatened under Ontario *ESA* 2007 and special concern under the federal *SARA*). There is also potential for Hill's Thistle (*Cirsium hillii*—threatened federally and in Ontario) which is known from alvars in the surrounding area. As well, there are five provincially rare species (ranked S3 or less) and the ecosystem itself is ranked G2 or globally imperiled.

My concerns with the proposed transmission corridor route are as follows:

1) Houghton's Goldenrod is present in the ditch and in the alvars along Harbour View Road and in several areas of Goat Island. Gattinger's Agalinis is present in several areas

of Goat Island. As well, there is a historic record for Gattinger's Agalinis that has only "Little Current" as the location information, and there are very few other places with suitable habitat in Little Current where this species might occur. Thus, there is high probability this species occurs along Harbour View Road. Hill's Thistle's has not been looked for on Harbour View Road or Goat Island, but there is suitable habitat in both locations which may be occupied.

2) Northland Power (NP) proposes to bury cable along the side of Harbour View Road. However, there is very little depth of earth along either side of the road where it goes across the open alvar (in the vicinity of the commercial garage). Burying cable will require blasting bedrock and importing and installing some type of covering material for the cable, all of which will destroy the species at risk as well as their habitat. Before such work is approved, Northland will need to go through a permitting process under *ESA 2007* and design appropriate mitigation.

2) Survey work for Houghton's Goldenrod and Gattinger's Agalinis must be done in late August or early September; otherwise, these species cannot be conclusively identified, and the work needs to be done by someone with credible experience in identifying these species. Gattinger's Agalinis is a very small, inconspicuous, annual species that is not present at all until late summer. The plants flower in the morning and the flowers generally fall off the stems by mid-afternoon, making the plants very hard to find. In addition, this species has a long-lived seed bank, and in my experience the live plants may be present in some years (when conditions for germination are suitable) but may be absent in other years. This means that lack of plants in any one year does not rule out the species general presence in an area. Houghton's Goldenrod is also a late-blooming species, blooming after the very similar Ohio goldenrod (*Solidago ohioensis*) which occurs in the same habitat and with which it is easily confused. I refer you to the COSEWIC reports for these species and to the SARA registry website for further information.

4) Construction planning for the transmission corridor also needs to be carefully assessed before any approvals are granted, to ensure that construction activities such as parking of machinery and storage of materials do not harm these species at risk. Impacts can be minimized by planning locations for these activities that are not on alvars.

As background, some parts of the Goat Island alvars and species at risk populations there were mapped in 2004 by then-MNR species at risk biologist Paul Biscaia and myself. There has also been some reconnaissance-level survey work on one private property in the alvar on Harbour View Road. All of this information should still be available. The current MNR species at risk biologist for Manitoulin-Sudbury, Nikki Boucher, and the acting regional Species at Risk Biologist Eric Cobb are aware of the issues at both the Goat Island and Harbour View locations.

All in all, in my opinion, Harbour View Road is a poor choice for the location of the transmission corridor. Running the cable through a different area would avoid a lot of

problems both for the company and for the species at risk in question. If the route is not changed, then mitigation for these species will be necessary. However, these species grow in very sensitive conditions which are very difficult to simulate (e.g. by transplanting the species or by replacing the shallow layers of soil, etc.). Alvars are very easily damaged, which is the main reason why these habitats have become so rare in the first place.

In a controversial project such as this one, the public expects Northland Power to act responsibly and follow all legal procedures to avoid impacts to species at risk. I have provided the information in this letter to ensure that the OEB and Northland Power are aware of the issues with these locations. If I can be of further assistance on this matter, please do not hesitate to contact me.

Sincerely,



Judith Jones, M.S.
Biologist

Cc:

Gordon Potts, Northland Power
Eric Cobb, OMNR Sudbury
Nikki Boucher, OMNR Sudbury
Wayne Selinger, OMNR Espanola