



**association to protect  
AMHERST ISLAND**

PO Box 4, 5695 Front Road  
Stella, ON K0H2S0  
[peter.large2@gmail.com](mailto:peter.large2@gmail.com)

July 12, 2013

Ms Doris Dumais, Director  
Environmental Approvals Access and Service integration Branch  
Ministry of the Environment  
Floor 12A, 2 St. Clair Avenue West  
Toronto, ON M4V 1L5

Dear Ms. Dumais:

I am a member of the Association to Protect Amherst Island (APAI), a registered Association of 350 members with the current principle objective to stop the 33- 37, 50-storey Industrial-scale wind turbine installation proposed for Amherst Island by Algonquin Power.

APAI has written extensive critiques of Algonquin's REA reports showing them to be incomplete, with considerable omissions and errors, both in fact and science. One such example is Stantec's seriously flawed report on Amherst Island's Natural Heritage.

There is another report we request you consider and that is Stantec's 'Decommissioning Plan Report', a requirement of the REA process.

(A) Decommissioning 33-37, 50-storey-tall wind turbines at the end of their useful life could be as costly as erecting them (One cost estimate is \$100 million).

The MOE does not require Algonquin (or its successor) to post security to ensure there will be money available to carry out its decommissioning plan.

As such, the cost of dismantling the turbines and the liability for the health, safety and environment would fall on the landowner. If the landowner cannot/will not pay, the Municipality or the Province would be forced to step in, as it does now with abandoned oil and gas wells.

Without security to ensure the proper decommissioning of wind turbines and the lands on which they are constructed, the costs, both financial and in terms of human health and the environment will be passed on to future generations.

In the case of Amherst Island, the 'future' generation is already here, represented by the children that play in our parks, on our streets and who attend our Island school.

(B) Stantec's report, in the Section 5) 'Managing Excess Materials and Waste' includes Table 5.1, which lists turbine components and the 'Mode of Disposal', 'Recycle' is mentioned six times, 'Dispose in Landfill' is mentioned four times.

Our research has found no landfills regulated to receive used turbine parts and no recycle facilities. We have asked Minister Bradley in two separate letters where such facilities might be found in Ontario, yet have had no reply which suggests that no such facilities exist in the Province.

(C) We have concluded that:

- There exists the potential that Algonquin Power will sell the Amherst Island project, before the 20-year term of the project is complete.
- The MOE does not require the proponent to post security to ensure there will be money available to carry out decommissioning.
- The cost of decommissioning the Amherst Island project if said project is approved, will fall on the Province, and thence to the tax-payer since neither landowner nor Township can afford the \$100 million cost.
- There are no recycling depots or registered landfills to take used turbine parts in Ontario.
- With no dedicated funds set aside for the cost of decommissioning, there exists the risk that, if the proposed Amherst Island project is built, no decommissioning will be done, leaving old turbines standing on Amherst Island where they would pose a long-term risk to human health, the environment and tourism.

This permanent 'rust-belt' scenario for Amherst Island's future is unacceptable and flies in the face of the recent Heritage Canada Foundation's 2013 rating of Amherst Island as one of the Top Ten Endangered Places in Canada, its rare natural and cultural heritage threatened by Algonquin's proposal to industrialize the Island.

Conclusion:

There is a solution for the Ontario Government. Reject Stantec's REA report on 'decommissioning'. The report is incomplete and the proposed decommissioning is uncompletable by reason of the lack of landfill and recycling facilities in the Province.

APAI's science- and fact-based evidence shows that Amherst Island is the wrong place for turbines.

Many Naturalist organizations have said the same thing, as has the Heritage Canada Foundation and as have over 80% of Amherst Island residents.

The fact that 'decommissioning' (an REA requirement) as proposed cannot be completed satisfactorily is an additional, powerful reason why this project needs to be rejected.

Respectfully submitted,

Peter G.S. Large, P. Eng.  
President, APAI

Cc:

- Loyalist Township Council
- Mr. Randy Hillier, MPP, PC
- Hon. Jim Bradley, Minister of the Environment
- Hon David Oraziotti, Minister of Natural Resources
- Premier Kathleen Wynne
- Ms Jane Wilson, President WCO
- Mr. Tyson Champagne, Executive Director, SWITCH Kingston
- Mr. Ian Robertson, CEO, Algonquin Power