



association to protect AMHERST ISLAND

PO Box 4, 5695 Front Road,
Stella, ON K0H2S0
protectai@kos.net

Premier Kathleen Wynne
Legislative Building
Rm 281 Queen's Park
Toronto, ON
M7A 1A1

August 20, 2013

RE: Follow-up to the Perth Protest by Amherst Islanders and the Association to Protect Amherst Island (APAI)

Dear Premier Wynne:

We met in Perth on Aug. 6, 2013 and I had the opportunity to speak to you directly about why Amherst Island is the wrong place for a massive industrial wind power plant. As promised, we are sending more information on Amherst Island and the 75 MW wind energy project proposed for this Island.

We are also writing to urge your government to reject the Windlectric/Algonquin Power renewable energy application currently under review by the Ministry of the Environment (MOE). There are ample reasons and means to reject the developer's plan.

The proposed industrial wind power plant is massive in size^{1,2} and is not compatible with the ecological and environmental integrity of Amherst Island. There is no doubt that industry of this scale will destroy the essential character of this ecologically fragile Island.

For us, it is difficult to conceive of any justification for targeting and completely industrializing a small Island that is world renowned for its owls, its biodiversity, and its unique cultural heritage. It just doesn't make sense to destroy 'Galapagos of the North' to save the environment.

Your government's plans for a 75 MW wind power plant on Amherst Island have placed Amherst Island on the Heritage Canada Foundation's (HCF) list of the ***"Top Ten Most Endangered Places***

¹ Hatch Noise Map; Attachment #1

² Imagine 36 TD Centres on One Small Island; Attachment #2

in Canada” (June 2013)³ HCF has declared that the cultural and heritage landscape of the entire Island is “endangered”.

It is not too late to reject this project.

We request that your government:

➤ **place Amherst Island off-limits to industrial wind power projects**

Ontario’s Commissioner for the Environment in his last report entitled *Losing our Touch* said “we need to be smarter about where we place wind power facilities”. He advised that the Ontario Government should put additional areas of the province off-limits to wind power projects to safeguard birds, bats and their habitats.

Amherst Island is internationally recognized for its concentrations of wintering hawks and owls, and its “Owl Woods”⁴. The Island is also an International Bird Area (IBA) and is located on the Atlantic Migratory Flyway. Twenty-four of the bird species found on Amherst Island are species at risk. The endangered Little Brown Bat, Northern Bat also make Amherst Island their home.⁵

A close look at all the evidence will reveal that Amherst Island is one of the areas of the Province that must be off-limits to industrial wind turbines.

❖ **preserve Amherst Island for Its Biodiversity and Species at Risk⁶**

Your Minister of Natural Resources, Hon. David Oraziotti in a recent release said “Each one of us has a responsibility to protect our species at risk and safeguard Ontario’s biodiversity for future generations.”⁷

Amherst Island ranks high in biodiversity⁸ and has at least 34 species at risk, including a healthy population of endangered Blanding’s Turtles.

It makes sense to preserve Amherst Island and to build on its record of successful stewardship. Preserving Amherst Island is one way your government can deliver on its commitments to biodiversity and species at risk.

However, the developer has recently requested an overall benefit permit that if approved will allow them to kill, harm and harass three of the threatened and endangered bird species on Amherst Island should the project be approved.

We request that Minister Oraziotti deny these permits and chart a more positive future for Amherst Island that is compatible with its ecology and way of life and addresses this government’s stated commitment to species at risk.

³ Heritage Canada Foundation: Excerpt from Top Ten Endangered Places in Canada 2013; Attachment #3

⁴ See Kingston Field Naturalists http://kingstonfieldnaturalists.org/birding/amherst_island.pdf

⁵ See <http://protectamherst.yolasite.com>

⁶ <http://protectamherst.yolasite.com/>

⁷ Minister Oraziotti, *Helping Ontario Protect Rare Plants and Animals*, July 17, 2013

⁸ Nature Conservancy of Canada *Island's of Life*, MNR funded report on Ontario's Biodiversity, 2010.

❖ **deem the Windlectric/Algonquin Power application “INCOMPLETE”**

The application is being reviewed for completeness by the MOE. It is in your power to slow down or stop this project now.

Loyalist Township Council⁹, the County of Lennox-Addington Council and the majority of Islanders represented by APAI have declared the Windlectric/Algonquin Power application to be both deficient and premature.

APAI has sent extensive supporting documentation to the Ministry of the Environment^{10, 11}, alerting them to the missing field studies¹², incomplete reports and errors.

In our conversation you said you believed in the environmental review process and the science. If the environmental process is working, the studies and documentation should be enough to stop the project or at the very least the MOE should send the developer back to do the science and to hold additional public meetings.

It is difficult to trust that the REA process will protect Amherst Island, when the Liberal government and the MOE have approved every renewable energy application that has been submitted. This is why we are reaching out to you and your Ministers to take a very close look at this project. We ask that your government ensure that the evidence and the science are sound and reflect the true situation.

A case in point is the striking lack of field studies on Amherst Island's Species at Risk¹³ and in particular the Island's endangered Blanding's Turtles¹⁴. The Kingston Field Naturalists and the local people know that turtles are native to Amherst Island. The field studies were extremely limited and were not conducted during this turtle's nesting period when they are most active.

Not surprisingly, the proponent indicates he did not record this species of turtle on Amherst Island. Is it up to us to provide the scientifically verifiable studies on their presence, density and habitat? Is it also up to us to carry out all the studies that the developer has not adequately conducted?

We ask that you and your Ministers take a very hard look at all the evidence. The evidence should not be limited to the inadequate studies prepared by the proponent. These studies are designed to advance the project and eliminate barriers to approval and do not tell the entire story.

❖ **reject the Windlectric/Algonquin Power Renewable Energy application as fundamentally flawed**

The fatal flaw is that Amherst Island, at only 66 sq. km., is simply too small an island to support an industrial scale wind power plant of 75 MW.¹⁵ Should the government approve this project it will be a disaster in the making for the Island and a future embarrassment for your government.

⁹ Loyalist Township Declares the Windlectric Application Premature, APAI Bulletin; Attachment #4

¹⁰ APAI Executive Summary of Critiques; Attachment #5

¹¹ APAI critiques (full versions) <http://protectamherst.yolasite.com/response-to-algonquin-rea-reports.php>

¹² <http://protectamherst.yolasite.com/resources/%C2%A0Avian%20SAR%20PDF.pdf>;

¹³ No fieldwork fact sheet: Avian Species at Risk

¹⁴ No fieldwork fact sheet Non-Avian Species at Risk; Attachment #6

protectamherst.yolasite.com/resources/%C2%A0Non%20Avian%20SAR%20PDF.pdf

¹⁵ Algonquin Power's proposed siting of 37 wind turbines and associated roads on Amherst Island; Attachment #7

When the land mass is not sufficient to support a large industrial wind project, the entire project design becomes flawed. There is no room to fix it and there is virtually no opportunity to use “avoidance” as a mitigation strategy. ¹⁶

A few examples include:

- the school yard for our children is within the 550m setback of a turbine, as is their gym
- an independent study shows that 58 homes will be subjected to shadow flicker that exceeds international standards;
- nineteen homes are predicted to exceed MOE noise standards¹⁷
- four 507' high turbines are being placed immediately adjacent to our world famous Owl Woods¹⁸
- Turbines are sited close to homes...an acoustician after conducting an independent review of the project said he had never seen a project with so many turbines so close to so many homes. In most cases the 550' setback encroaches on neighbouring properties because unlike the prairies, most farms here are small (100 acre)¹⁹
- the proponent has determined that there will be some degree of destruction to all four of our Protected Properties

The evidence and the site plan demonstrate that this project will result in maximum disruption and harm to Amherst Island residents, to the environment, the Island's ecosystem and its rich cultural heritage. The project is too large for the Island and is not compatible with its environmental, cultural and ecological integrity.

The Windlectric/Algonquin project is not feasible. The first two developers that arrived on our shores also failed to make it work. The belief that this Island can support this large a project has been proven to be false.

❖ involve local government in decisions on the siting of large industrial wind power plants.

Amherst Island is located in Loyalist Township in the County of Lennox Addington. Loyalist Township Council does not support an industrial wind power plant on Amherst Island, nor does the County of Lennox-Addington.

The Township currently has six renewable energy projects on the books. One of these is a very large solar project by the Korean Consortium. Another wind project, the Ernestown Wind Park, has just been approved by MOE and will be located 5 km north of Amherst Island.

Randy Hillier MPP and Scott Reid MP have listened to our arguments and agree that Amherst Island is not the place for industrial-scale wind turbines. They are solidly opposed to the project and fully support APAI's efforts to preserve Amherst Island and stop the project.

We urge you to include FIT 1 projects in your new approach and increase the involvement of our local municipality in the decision-making process for the proposed Amherst Island project

¹⁶ Top Ten Reasons to Reject the Windlectric Proposal Fact Sheet; Attachment #8

¹⁷ Harrison, Dr. John Lack of Compliance #9

¹⁸ Owl Woods and Turbines #10

¹⁹ Encroachment Map Attachment #11

❖ **Restore democracy to Amherst Islanders**

Only 18 property owners have signed leases. Despite this, the developer has identified the **entire** Island as their “project location”. A majority of local residents are opposed to industrial-scale wind power on Amherst Island and this Island is not a willing host to an industrial wind power plant.

We ask you...what kind of a crisis would warrant profoundly changing the way of life of a tightly knit community of 400-800 inhabitants who live on a small remote Island, and removing their democratic right to shape their own future?

We know that your government is predicting a significant surplus of base load generation over the next three years. There is no energy crisis in Ontario and we are not willing to sacrifice the whole of Amherst Island.

Industrial scale turbines are not the only way to contribute to the Province’s renewable energy targets. Small-scale solar projects make more sense for this Island and Amherst Island already has a number of them.

In Summary: A way forward for the Liberal Government and Amherst Island

Within six to eight months, you and your government will make a decision to either reject or approve the Windlectric/Algonquin Power wind power plant on Amherst Island.

The evidence and common sense tell us that an industrial scale wind power plant will destroy Amherst Island and all that currently draws people and wildlife to our shores.

There are ample reasons and means for your government to reject the Windlectric/Algonquin Power wind power plant now...before it goes any further. We are counting on you to recognize the heavy burden that this project will place on our small Island.

Your government has a responsibility and an obligation to protect Amherst Island from becoming an industrial wasteland.

We respectfully request that you reject the Windlectric/Algonquin Power application.

Yours truly,

Laurie Kilpatrick
Telephone: 613 634-3057
Association to Protect Amherst Island (APAI)

APAI website	www.protectamherstisland.com
APAI yola website	http://protectamherst.yolasite.com
Facebook Page	https://www.facebook.com/ProtectAmherstIsland

Perth Ontario August 6, 2013



Premier Kathleen Wynne meets Laurie Kilpatrick



Premier Wynne exams noise contours on Amherst Island