



# Kingston Field Naturalists

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P.O. Box 831 Kingston, Ontario K7L 4X6 Phone: (613) 389-8338  
<http://www.kingstonfieldnaturalists.org>

11 November 2011

Mr. Sean Fairfield  
Manager, Environmental Planning  
Algonquin Power  
2845 Bristol Circle  
Oakville, ON  
L6H 7H7

RE: AMHERST ISLAND WIND PROJECT  
Notice of Proposal to Engage in a Project

Dear Mr. Fairfield,

On the occasion of the release of the Amherst Island wind project description report, the Kingston Field Naturalists would like to restate our opposition to the development of an industrial wind farm on Amherst because of its potential harm to wildlife.

In the report, the wind farm is proposed to consist of approximately 40 wind turbines. The exact location of the turbines is not indicated but given the size of the island and the required setbacks from non participating land owners, it is safe to assume that they will be distributed throughout the island.

As is shown on the figure identifying the study area, Amherst Island is a small island with very few roads. There are only two concession roads inland on the west side of the island beside the road that goes around the island along the shore. We estimate that there is only about 50 km of roads on the island. Away from the roads, there are still substantial forested areas that support nesting birds. The construction of access roads to 40 turbines will double the length of roads on Amherst. This will cause significant habitat fragmentation and make the remaining forested area less suitable for nesting.

The figure also shows three major coastal wetlands on Amherst. Coastal wetlands are rapidly disappearing in Ontario. They are the breeding grounds for several rare species like Least Bittern and Black Tern to mention just two. Construction of turbines can occur within 50 meters of such wetlands and the mortality studies on Wolfe Island have shown that species like Wilson Snipe, which nest in wetlands, have experienced significant casualty.

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Amherst Island is home to a major winter raptor population. The concentration of wintering raptors on Wolfe, Amherst and around Brantford is significantly higher than anywhere else in Ontario. The same steady wind that powers the turbines keeps the snow cover to a minimum so that raptors can feed on the significant vole population. Again, the mortality study on Wolfe has indicated that these raptors will collide with the turbines. Nesting raptors (Red-tailed Hawks, Ospreys, Merlins and Turkey Vultures) were also killed on Wolfe and over time, we believe this attrition rate will lead to the extirpation of these nesting species from the western portion of Wolfe Island and from all of Amherst Island. Also, significant mortality of bats has been noted on Wolfe Island. The populations of bats are poorly known and are already under pressure from disease. This level of casualty may also lead to their extirpation from Amherst

Amherst Island is also home to a large number of owls. Because of the accessibility of voles, some species of owls will take residence on the island in years where lemmings are not available in the northern forests. Snowy Owls, Saw-whet Owls, Long-eared Owls and Short-eared Owls can be seen on the island in winter and during irruption years, dozens of Great Grey Owls can be found on Amherst. There have not been any reports of owl mortality on Wolfe but there is strong evidence that Short-eared Owls are moving away from areas where wind turbines have been installed. The loss of winter habitat for these owls that usually arrive south in very poor condition could be lethal.

We attach the letter sent in 2008 that was indicating our objection to the project at that time. Since then, the mortality studies on Wolfe have shown that all our concerns were justified. The casualty rates for raptors on Wolfe are the highest in North America after the wind farm at Altamont Pass in California. There is no reason to believe that the outcome on Amherst Island would be different. Therefore, the Kingston Field Naturalists remain firmly opposed to this project.

Gaye Beckwith  
President  
Kingston Field Naturalists

Cc  
Hon. John Gerretsen, MPP, Kingston and the islands  
Hon. Jim Bradley, Minister of the environment  
Peter Large, Director, APAI

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January 16, 2012

Shannon McNeill  
Senior Project Evaluator  
Ministry of the Environment  
Operations Division  
Environmental Approvals Branch

Reference: **EBR number 011-5239**  
Ostrander Point Wind Energy Park

Sir/Madam,

The Kingston Field Naturalists (KFN) are opposed to the construction of wind turbines at Ostrander Point.

Prince Edward County is a well known destination for birding and in particular, very close to Ostrander Point is Prince Edward Point which is a Bird Reserve because of its importance during migration in the fall and spring. Ostrander Point is itself an Important Bird Area (IBA). Results of a radar study were presented in the Environmental Review Report (ERR) submitted by Stantec Consulting Ltd. in 2009. They confirm that large numbers of birds migrate through Ostrander Point. In spring, "approximately 70,355 targets were detected" and in fall, "approximately 160,649 targets were detected". These are impressive number of birds. It was also reported in the ERR that between 40 to 50 % of these birds are flying between 50 and 150 meters above ground and are therefore at risk of collision with the turbines' blades.

Since then, mortality studies conducted at the Wolfe Island wind farm have shown that significant numbers of migrant and resident raptors are being killed each year at that facility. Because the density of migrants at Ostrander Point is much higher, it is a certainty that numerous raptors will be killed if the project goes ahead. We believe that such mortality could significantly reduce the province wide population of Golden Eagles and Merlins. It will also eradicate resident raptors like Red-tailed Hawks and Ospreys because their reproductive rate is low so that they cannot recover from the loss of even a few individuals every year.

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The study area contains the South Bay Marsh Wetland and is adjacent to the South Bay Coastal Wetland. Coastal wetlands are under pressure everywhere around Lake Ontario. Some threatened species, like Black Tern and Least Bittern, use this type of habitat extensively. The mortality study on Wolfe Island revealed that another denizen of these wetlands, the Wilson's Snipe, fell victim to the turbine blades on several occasions. There is every reason to believe that the two threatened species mentioned above would suffer the same fate.

Currently, the road system in this area of Prince Edward County consists of narrow gravel roads. Ostrander Point Road in particular is no more than a one lane driveway and Helmer Road is similar. In the ERR, these are described as "narrow, poorly drained and not up to proper standard". Significant road enlargement will take place during the construction phase of the project. In view of the fact that these roads are running through watercourses and wetlands, their proposed enlargement will result in a clear loss of wetland.

Because of the anticipated loss of habitat during the construction phase of this project and the irreversible damage to the population of migrating and resident raptors and to threatened species during the operation of the turbines, the Kingston Field Naturalists is categorically opposed to this project.

E. Batalla  
Conservation Committee  
Kingston Field Naturalists

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